## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

Case No. CR-21-351-JFH

PARKER RYAN LITTLE,

v.

Defendant.

## PROTECTIVE ORDER GOVERNING DISCOVERY

Upon the motion of the United States and having found good cause exists to regulate the dissemination of discovery pursuant to Federal Rule of Criminal Procedure 16(d), it is hereby ORDERED:

- 1. In order to protect the safety and privacy interests of victims and to encourage early, broad and expansive discovery in this case, the defendant, the defendant's attorneys of record (including any additional or new counsel that may appear on behalf of defendant after such protective order is issued), experts retained by defendant's attorneys of record, and agents, employees, or staff members of defendant's attorneys of record who are necessary to assist the attorneys of record in preparation for trial in this case (together, the "Defense Team"):
  - a. Shall use all materials produced by either party as discovery in this case ("Discovery Materials") solely for purposes associated with the above-captioned criminal case and shall not use or disclose any Discovery Materials for any other purpose, including for any other administrative, regulatory, civil, or criminal proceeding (other than proceedings arising from this prosecution under 28 U.S.C. § 2255), regardless of jurisdiction, unless specifically permitted and ordered by this Court;

- b. Shall comply with the requirements of Federal Rule of Criminal Procedure 49.1(a) when filing any Discovery Materials with this Court (unless such materials are filed under seal);
- c. Shall redact the names of any third parties or victims from any Discovery Materials filed with this Court (unless such materials are filed under seal);
- d. Shall identify third parties or victims in all publicly filed or disseminated documents by initials or a generic name (unless such documents are submitted under seal);
- e. Shall keep all Discovery Materials that disclose the names of third parties or victims or any other information concerning third parties or victims in a secure place to which no person other than members of the Defense Team has access;
- f. Shall not, directly or indirectly, including through family members or other personal contacts, contact or attempt to contact third parties or victims in this case; *provided*, however, that this prohibition does not prohibit defendant's attorneys of record, or an agent, staff member, or employee for defendant's attorneys of record, from contacting potential witnesses;
- g. Shall not disseminate or show the Discovery Materials or information contained therein to persons or parties who are not members of the Defense Team;
- h. Shall not reproduce materials provided by the government pursuant to its discovery obligations, in any medium or format, for dissemination to any persons or parties, including the defendant, and shall maintain complete custody and control over the materials, including all notes and copies;
- i. Shall not allow, under any circumstance, any originals, copies, or summaries of the following Discovery Materials, in any medium or format, to remain with

the defendant or any person outside of the Defense Team, or to be left in any detention

facility for review outside of the presence of the defendant's attorneys of record: law

enforcement reports; investigative reports; witness statements (whether electronically

recorded or in the form of handwritten statements by the witnesses); memoranda or reports

of witness interviews; search warrant affidavits; medical records (other than defendant's

own medical records); audio recordings; video recordings; and grand jury testimony and

exhibits. Defendant's attorneys of record also agree not to show any such materials,

memoranda, or witness interviews to any witness in the case, except for any transcribed

testimony or written statement signed or expressly adopted by that witness;

j. Shall not disclose any notes or records of any kind that concern or otherwise

relate to the contents of discovery materials except to members of the Defense Team, and

all such notes or records are to be treated in the same manner as the original discovery

materials; and

k. Shall, upon conclusion of all matters relating to this criminal case, destroy

or return all materials produced by the government as discovery in this case. This Court

may require a certification as to the disposition of any such materials.

2. Nothing contained in this Order shall preclude any party from applying to this

Court for further relief or for modification of any provision hereof.

Dated this 28th day of February, 2022.

KIMBERLY E. WEST

UNITED STATES MAGISTRATE JUDGE

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3